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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff;

vs.

GLEN HUNSBERGER et al,

Defendants.

CASE NO.: 2:14-cr-328-KJD-NJK

**STIPULATION TO EXTEND DEADLINE
TO FILE OBJECTIONS TO REPORT
AND RECOMMENDATION AND
PROPOSED ORDER**

(First Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Robert Knief, Assistant United States Attorney, counsel for the United States of America, and Kathleen Bliss, counsel for Glen Hunsberger, that the current deadline of October 10, 2016, by which defendant must file his objections to Magistrate Judge Koppe's Report and Recommendation on Defendant's Motion to Suppress be extended to October 14, 2016. This stipulation is entered into based upon the following:

1. Defendant Glen Hunsberger stands charged with one count of conspiracy to manufacture and possess with the intent to distribute controlled substances within 1000 feet of an elementary school in violation of 21 U.S.C. §§ 841(a)(1), (b)(1)(A), 846, and 860(a); and one count of conspiracy to commit money laundering in violation of 18 U.S.C. § 1956(a)(1)(A)(i), (B)(i), and (B)(ii). ECF No. 161.
2. Defendant filed his Motion to Suppress the search and seizure of a certain USPS parcel

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on August 22, 2016. ECF No. 181.

3. Magistrate Judge Koppe issued her Report and Recommendation to deny Defendant's Motion on September 23, 2016. ECF No. 198.
4. Defendant's Objections to Judge Koppe's Report and Recommendation are currently due by October 10, 2016. *Id.*
5. Due to competing case commitments, counsel for Mr. Hunsberger is unable to complete said objections by the current due date, taking into account the exercise of due diligence. Counsel requires a short four day extension.
6. Based upon the foregoing, counsel for Defendant and the government hereby stipulate and agree to an extension of the deadline within which Defendant must file his Objections to the Report and Recommendation. Defendant shall file his Objections on or before October 14, 2016.
7. This Stipulation is entered into in good faith and not for purposes of delay.

Dated this 8th day of October 2016.

/S/ Robert Knief
Robert Knief
Assitant United States Attorney
Attorney for the United States

/S/ Kathleen Bliss
Kathleen Bliss, Esq. of
Kathleen Bliss Law PLLC
Attorney for Defendant Glen Hunsberger

ORDER

Based upon the stipulation of counsel for the United States and for the Defendant, and good cause appearing, it is hereby ORDERED that the current deadline in which Defendant must file his Objections to Magistrate Judge Koppe's Report and Recommendation on Defendant's Motion to Suppress is extended to October 14, 2016.

IT IS SO ORDERED:


United States District Judge

DATED: October 11, 2016